

FCC APPEAL of USAC DENIAL - PEORIA SCHOOL DISTRICT 150

June 15, 2006

Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Request for Review of a decision made by USAC – CC Docket Nos. 96-45 and 02-6

Decision being appealed: Funding Commitment Decision Letter - Denial

FCDL Date: November 23, 2005
Form 471Number: 455386
Funding Year: 2005 (7/1/2005 – 6/30/2006)
Billed Entity Name: Peoria School District 150
BEN: 136178
FRN: 1287955
Service Provider: Verizon Wireless
SPIN: 143000677

Contact Person: Dan Bayless, Network Manager
Phone: 309-685-3114
Fax: 309-282-0689
E-mail: dan.bayless@psd150.org

Summary: We are not presenting any new information here. We believe that this FRN denial should be addressed and reversed under the criteria of the recent FCC decisions on ministerial errors and on Form 470-related procedures announced on the SLD Web site on May 15, 2006 (<http://www.universalservice.org/sl/tools/latest-news.aspx#051506>).

The SLD denied FRN 1287955 for Verizon Wireless because we cited the wrong 470 on the 471 Application and during PIA review we failed to fully correct our error. Peoria filed an Appeal with the SLD on January 22, 2006. Peoria received a Denial of this Appeal on April 27, 2006. We are appealing the Administrator's decision partly based on the May 15 decisions.

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The 471 in question covers all of Peoria's Telecommunications Services from two providers: McLeod USA and Verizon Wireless. We made the same error on (all) four FRN's on the 471 in that we cited the wrong 470. Three of the four were corrected during PIA when we supplied the corrected information to SLD. We mistakenly believed that this would correct all of the FRNs on the application. However, the three that were corrected all referred to McLeod USA as the Service Provider. This FRN, that concerns Verizon Wireless, was denied.

Our Appeal to the SLD was a request to provide the same type of corrective information to this FRN that we had already provided to the other three FRNs on our 471. In their denial of our appeal (attached below) the SLD said that we had been given an opportunity to correct our error and that *"Program procedures do not permit the SLD to accept any new information on appeal, except where an applicant was not given an opportunity to provide such information or when an error was made."* We are now appealing to the FCC to reconsider our request, based on the FCC's recent decisions and overall mission of the Universal Service program.

All of the details are contained in our original appeal document and the PIA request and response attached to this appeal document below.

Impact of This Denial: Peoria School District has already expended the funds in question. This denial represents an out-of-pocket loss to the district of over \$36k. We believe that a re-consideration of this FRN and approval of our request is in keeping with the overall goals of the E-Rate program.

We assure the FCC that we have been and remain strident in our efforts to understand and comply with all SLD guidelines. This denial is the result of a clear error on our part, however it was an administrative, clerical oversight and we request the FCC's understanding of such.

We would appreciate being given the opportunity to correct our clerical error and have the FRN re-evaluated and funded.

Sincerely,
Dan Bayless
(Submitted Electronically via ECFS)
Peoria School District 150
Roy S. Ricketts Center
520 E. Lake Street
Peoria, IL 61614
Phone: 309-685-3114
Fax: 309-282-0689

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E-mail: dan.bayless@psd150.org

Attachments: SLD Denial of Appeal – Letter Dated April 27, 2006

Peoria School District Appeal to SLD – Letter Dated January
22, 2006

PIA Request Letter to Peoria dated September 1, 2005

Peoria SD Response to PIA dated September 14, 2005

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Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2005-2006

April 27, 2006

Don Dietrich
Dietrich Lockard Group, Inc.
1516 South Brentwood Boulevard, Suite 110
St. Louis, MO 63144

Re: Applicant Name: PEORIA SCHOOL DISTRICT 150
Billed Entity Number: 136178
Form 471 Application Number: 455386
Funding Request Number(s): 1287955
Your Correspondence Dated: January 22, 2006

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of SLD's Funding Year 2005 Funding Commitment Decision Letter for the Application Number indicated above. This letter explains the basis of SLD's decision. The date of this letter begins the 60-day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1287955
Decision on Appeal: **Denied**
Explanation:

- On appeal, you request the reversal of SLD's decision to deny the above referenced FRN because you cited an incorrect Form 470. You state that the District filed a Form 471 requesting Telecommunications services from two service providers: McLeod USA and Verizon Wireless. You state that you cited the wrong Form 470 on four FRNs. During your form initial review, you submitted information that corrected the error on the funding requests that listed McLeod USA as the service provider. You were under the impression that the information provided would cover all the FRNs on your Form 471. You further explain that when you filed your Funding Year 2005 Form 471 application, you mistakenly used the Tariffed/MTM designation on all of your Telecommunications funding requests. In fact, the district has a contract with Verizon Wireless, which was posted to a Form 470 for Funding Year 2004. You

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Visit us online at: www.sl.universalservice.org

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admit and regret that you did not provide the Verizon Wireless Contract information during initial review. On appeal, you would like an opportunity to provide the correct information.

- After a thorough review of the appeal, it was determined that the services being requested on Block 5 (Items11) of the above listed funding request are Telecommunications services. The Funding Year 2005 Form 470 (Application Number: 534820000513009) does not include a posting for this service category. During the course of the initial review of this application, you and the applicant were contacted by the SLD on September 1, 2005, September 13, 2005 and September 21, 2005 to verify if an alternate Form 470 could be cited that had established the bidding for the Telecommunications services requested on this funding request. These requests were labeled time sensitive and instructed both of you to reply within seven calendar days. You failed to respond. As this information was not forthcoming, SLD was unable to determine if your request was in compliance with Program Rules. Therefore, the funding request was denied and forwarded for commitment. On appeal, you have failed to provide any evidence that SLD erred in its initial determination or that you responded to SLD's requests for additional documentation in a timely manner. On appeal, you request an opportunity to provide the correct information. Program procedures do not permit the SLD to accept any new information on appeal, except where an applicant was not given an opportunity to provide such information or when an error was made by the SLD.
- During the review of your Form 471, SLD sought additional information from you and notified you that this information needed to be provided within 7 days. You did not provide this information within 7 days or within any extended timeframe we agreed upon, or the information that you provided was insufficient to complete your Form 471 application. Consequently, SLD denies your appeal.
- SLD reviews Form 471 applications and makes funding commitment decisions in compliance with FCC rules. *See 47 C.F.R. § 54.500 et. seq.* To conduct these reviews, SLD has put in place administrative measures to ensure the prompt resolution of applications. *See Request for Review by Marshall County School District, Federal-State Joint Board on Universal Service, Changes to the Board of Directors of National Exchange Carrier Association, Inc., CC Docket Nos. 96-45 and 97-21, Order, 18 FCC Rcd. 4520, DA 03-764, ¶ 6 (rel. Mar. 13, 2003).* (Marshall County) One such measure is that applicants are required to respond to SLD's requests for the additional information necessary to complete their application within 7 days of being contacted. *Id.*; SLD section of the USAC web site, Reference Area, "Deadline for Information Requests," www.sl.universalservice.org/reference/deadline.asp This procedure is necessary to prevent undue delays during the application review process. *See Marshall County ¶ 6.* If applicants do not respond within this time period, SLD reviews the application based on the information before it.
- FCC rules require that all products and services for which an applicant requests discounts on an FCC Form 471 must be competitively bid on an FCC Form 470. The Form 470 must include a complete description of the services for which

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discounts are sought, be posted on the web site for 28 days, and applicants must carefully consider all bids received before selecting a vendor, entering into an agreement or signing a contract, and signing and submitting a Form 471. 47 C.F.R. §§ 54.504, 54.511(a) and (c). These competitive bidding requirements help to ensure that applicants receive the lowest pre-discount price from vendors. See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Order on Reconsideration, 12 FCC Rcd. 10095, FCC 97-246, p. 10098 ¶ 9 (rel. Jul. 10, 1997). The only exceptions to the posting requirement are for: (1) contracts signed on or before July 10, 1997 for the life of the contract; and (2) contracts signed between July 10, 1997 and before January 30, 1998 (the date on which the web site became operational) for products and/or services provided through June 30, 1999. 47 C.F.R. § 54.511(c) and (d).

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either the SLD or the FCC. For appeals that have been denied in full, partially approved, dismissed, or canceled, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

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SLD Appeal re: Peoria School District 150
Filed: January 22, 2006

Contact Information:

Name: Don Dietrich
Title: E-Rate Consultant to Peoria School District 150
(LOA on File and attached here)
Phone: 314-378-1667
Fax: 636-256-9317
e-mail: ddietrich01@earthlink.net

Submitted Online Case # 21-363234

SLD Action being appealed: This is an appeal regarding the decision in a Funding Commitment Decision Letter for FY 2005 dated November 23, 2005.

Funding Year: 2005
Form Type: FCDL (Funding Commitment Decision
Letter) Applicant Name: Peoria School District
150

Form 471 Application#: 455386
Billed Entity #: 136178
FRN #: 1287955

Denial Reason: *"The 470 cited did not include service of this
type: therefore
it does not meet the 28 day competitive bidding requirement."*

Overview and Summary:

The SLD denied FRN 1287955 for Verizon Wireless because we cited the wrong 470 on the 471 Application. This 471 covers all of Peoria's Telecommunications Services from two providers: McLeod USA and Verizon Wireless. We made the same error on (all) four FRN's on the 471 in that we cited the wrong 470. Three of the four were corrected during PIA when we supplied the corrected information to SLD. We mistakenly believed that this would correct all of the FRNs on the application. However, the three that were corrected covered all referred to McLeod USA as the Service Provider. This FRN, that concerns Verizon Wireless, was denied. We understand the SLD's decision and are requesting a chance to provide the corrected information here in hopes that the denial will be reconsidered.

Detailed Explanation:

Two years ago, when planning our E-Rate submission for 2004, Peoria posted a 470 for Telecommunications Services and followed up by signing contracts

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with McLeod USA for Local, Long Distance and Data services and with Verizon Wireless for Cellular service. Because of this (correct) planning, we did not file a 470 for Telecom for 2005. When we filed our 2005 471 Application, we mistakenly used the Tarrified/MTM

SLD Appeal re: Peoria School District 150 Filed: January 22, 2006

designation on all of our Telecomm FRN's, instead of referring back to the 2004 Form 470.

On September 1, 2005 we received a PIA request for information. The entire letter, along with our response, dated September 14, 2005 are attached at the end of this document and a portion of the PIA letter is shown below:

3. APP 455386 - 470/471 Service Type Mismatch

On your original Form 471 you indicated that Form 470 # 534820000513009 is the establishing Form 470 for the service requested all FRNs. These FRNs are for Telecom Services, but the referenced Form 470 did not post for this service category, which is a violation of the competitive bidding requirements of this support mechanism.

The first three questions in the PIA letter clearly referred to **all** of the FRN's on our 471 and we specifically called out all four FRN's in our response to question two. We responded to question three with the corrected 470 information as well as the request to change from Tarriff to Contracted services. Our response to question three is shown below:

Peoria Dist 150 Responses 09/14/05: A data entry error was made on the 471 entry for both of these FRN's. Both were tariffed services at the start of the 2004 Funding year, and both have been converted to contracted services for 2005. For both FRNs listed please make the following changes:

- 12. Ref 470# 946240000477363
- 15a. Non-Contracted tariffed/...NO
- 15b. Contract Number: McLeod-PSD150
- 15c. State Master Contract: NO
- 15d. FRN from Previous Year: N/A
- 17. Allowable Contract Date: 01/02/2004
- 18. Contract Award Date: 03/25/2004
- All other entries are correct as stated.

Unfortunately we included only the McLeod USA Contract information in our response. We fully admit, and regret, that we did not provide the Verizon

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Wireless Contract information. However, the Verizon Wireless FRN is indeed under contract from a previous year, with the identical contract signing, award and expiration dates. We should have requested a change in our PIA response. This was an oversight on our part.

On November 23, 2005 we received an FCDL that approved our three FRN's for McLeod but denied the Verizon Wireless. We respectfully request that the SLD allow us to correct the 471 information now (details below) and re-consider the FRN denial.

SLD Appeal re: Peoria School District 150
Filed: January 22, 2006

We assure the SLD that we have been and remain strident in our efforts to understand and comply with all SLD guidelines. This denial is the result of a clear error on our part, however it was an administrative, clerical oversight and we request the SLD's understanding of such.

We would appreciate being granted the award.

Sincerely,
Don Dietrich
(sent electronically via SLD Website)
E-Rate Consultant to Peoria School District
Phone: 314-378-1667
Fax: 636-256-9317
e-mail: ddietrich01@earthlink.net

Attachments: PIA Request Letter to Peoria dated September 1, 2005
Peoria SD Letter to PIA dated September 14, 2005
Signed LOA for FY 2005



Universal Service Administrative
Company
Schools & Libraries Division

Date: September 1, 2005

Dear Dan Bayless
Peoria School District 150
309-685-3114
Application 455386

As we discussed in our conversation, we are in the process of reviewing all Form 471 applications for schools and libraries discounts to ensure that they are in compliance with the rules of the federal universal service program. I am currently in the process of reviewing your Funding Year 2005 Form 471 Application. To complete my review I need some additional information. The information needed to complete the PIA Review is listed below.

1. FCC Registration Number

For the Billed Entity 136178, we do not have the associated FCC Registration Number (FCC RN). The FCC, in its Fifth Report and Order, requires entities that currently participate in the Schools and Libraries Support Mechanism have an FCC Registration Number. This requirement applies to schools, libraries, non-instructional facilities, consortium leaders, service providers and consultants.

If you already have an FCC Registration Number for your Billed Entity (the entity listed in Block 1 of the Form 471), please provide that FCC Registration Number.

If you do not yet have an FCC Registration Number, you can obtain one by applying to the FCC, at www.fcc.gov. Click on link for CORES (Commission Registration System), or go directly at the FCC CORES registration site at <https://svartifoss2.fcc.gov/cores/CoresHome.html>.

After obtaining the FCC Registration Number, please provide us the FCC Registration Number.

Additional guidance on this topic and filing tips are located in the Reference area of our website, under "FCC Registration Numbers"
<http://www.sl.universalservice.org/whatsnew/2004/102004.asp#102904>

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You will need your Taxpayer Identification Number (TIN) to obtain an FCC Registration Number. For some employers, including state and local government agencies and non-profit organizations, the TIN is the IRS-issued Employer Identification Number (EIN).

2. Non Instructional Facility (NIF)

Based upon review of your Form 471 application and/or the documentation you provided, we were not able to determine the eligibility of **<insert name of entity/non-school building>**. In order to be eligible to receive discounted services, per the rules of this support mechanism, the entity providing classroom instruction must be considered part of an elementary or a secondary school found in the No Child Left Behind Act of 2001 (20 U.S.C. Section 7801 (18) and (38)) which is not operating as a for-profit businesses, and does not have an endowment exceeding \$50 million. Please provide documentation that will verify that the entity meets the definition provided above.

If this entity is a non-instructional facility, which can be eligible for services under certain circumstances, please provide a written response to the following question: For FRN(s) _____,

Does either of these two descriptions accurately and completely describe your school, school district or library's situation? **If so, which one or both?** _____

- a) The non-instructional facility is owned by the school, school district or library and is used solely for school, school district or library business.
- b) Only school, school district or library employees use the non-instructional facility.

If the FRN is a request for Priority 2 services, please also respond to the following question:

Are the Internal Connections and/or Basic Maintenance in the non-instructional facility essential for the effective transport of data and information to an instructional building of a school or to a non-administrative building of a library?

Please provide a valid entity number for the above non-instructional facility. _____

For further information about funding requests to non-instructional facilities, consult the "Educational Purposes" document at www.sl.universalservice.org/reference/educational_purposes.asp

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You may refer to the document "Entity Numbers for Non-Instructional facilities" posted in the Reference Area of the SLD web site www.sl.universalservice.org for further information.

3. APP 455386 - 470/471 Service Type Mismatch

On your original Form 471 you indicated that Form 470 # 534820000513009 is the establishing Form 470 for the service requested all FRNs. These FRNs are for Telecom Services, but the referenced Form 470 did not post for this service category, which is a violation of the competitive bidding requirements of this support mechanism.

Please verify if the referenced Form 470 is the establishing Form 470 for this service. If the referenced Form 470 is NOT the establishing Form 470 please provide the 15-digit Form 470 Number that did establish the bidding for this service. The establishing Form 470 is the specific Form 470, which was posted for that particular service for 28 days, and pursuant to which a contract was signed or an agreement was entered into. For a request in the Basic Maintenance service category, it is possible that the establishing 470 was filed under an Internal Connections service category. The establishing Form 470 could have been posted by the State, if the requested services are being purchased off of a State Master Contract.

4. APP 455386 – Local Centrex

The documentation provided in the Item 21 Attachments is not sufficient to determine the eligibility of your request. The documentation indicates that you have Centrex Service. Please provide more detailed documentation, such as the portion of the bill that identifies the actual products and services relating to the charges identified above; do not include detailed call pages. If the bill you receive does not identify the specific products and services being delivered, you will need to contact your vendor and request such documentation. The vendor should be able to provide you with a detailed bill identifying the specific products and services being provided, which is sometimes called a C.R.I.S. Report or S01 Report.

Any documentation provided should clearly identify any ineligible charges that were cost allocated out of your request. If you are unable to justify the charges requested on your Form 471, the request may be reduced or denied.

5. APP 455386 – Long Distance

Your item 21 documentation stated 320 telephones. Please give the number of lines for this service (it could be less than 320). _____

Please fax or e-mail the requested information to my attention. If you have any questions please feel free to contact me.

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It is important that we receive all of the information requested so PIA can complete its review. **If you are unable to provide the requested information because your school has closed or will shortly close for summer break, please let me know when you will be available to respond to these questions. Failure to do so may result in a reduction or denial of funding.**

If we do not receive the information within seven calendar days (Sept 8, 2005), your application will be reviewed using the information currently on file. If you need additional time to prepare your response, please let me know as soon as possible.

Should you wish to cancel this application, or any of your individual funding requests, please clearly indicate in your response that it is your intention to cancel an application or funding request(s); along with the application number and/or funding request number(s), and the complete name, title and signature of the authorized individual.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Marilyn Brown
Schools and Libraries Division
Program Integrity Assurance
Phone: 973-884-8503
FAX: 973-599-6521
mbrown@sl.universalservice.org



Universal Service Administrative
Company
Schools & Libraries Division

Peoria Dist 150 Responses 09/14/05: Responses included within text below.

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Date: September 1, 2005

Dear Dan Bayless
Peoria School District 150
309-685-3114
Application 455386

As we discussed in our conversation, we are in the process of reviewing all Form 471 applications for schools and libraries discounts to ensure that they are in compliance with the rules of the federal universal service program. I am currently in the process of reviewing your Funding Year 2005 Form 471 Application. To complete my review I need some additional information. The information needed to complete the PIA Review is listed below.

1. FCC Registration Number

For the Billed Entity 136178, we do not have the associated FCC Registration Number (FCC RN). The FCC, in its Fifth Report and Order, requires entities that currently participate in the Schools and Libraries Support Mechanism have an FCC Registration Number. This requirement applies to schools, libraries, non-instructional facilities, consortium leaders, service providers and consultants.

If you already have an FCC Registration Number for your Billed Entity (the entity listed in Block 1 of the Form 471), please provide that FCC Registration Number.

Peoria Dist 150 Responses 09/14/05: The District's FCC Registration Number is 0012-0063-26

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If you do not yet have an FCC Registration Number, you can obtain one by applying to the FCC, at www.fcc.gov. Click on link for CORES (Commission Registration System), or go directly at the FCC CORES registration site at <https://svartifoss2.fcc.gov/cores/CoresHome.html>.

After obtaining the FCC Registration Number, please provide us the FCC Registration Number.

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Additional guidance on this topic and filing tips are located in the Reference area of our website, under "FCC Registration Numbers"

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You will need your Taxpayer Identification Number (TIN) to obtain an FCC Registration Number. For some employers, including state and local government agencies and non-profit organizations, the TIN is the IRS-issued Employer Identification Number (EIN).

2. Non Instructional Facility (NIF)

Based upon review of your Form 471 application and/or the documentation you provided, we were not able to determine the eligibility of *<insert name of entity/non-school building>*. In order to be eligible to receive discounted services, per the rules of this support mechanism, the entity providing classroom instruction must be considered part of an elementary or a secondary school found in the No Child Left Behind Act of 2001 (20 U.S.C. Section 7801 (18) and (38)) which is not operating as a for-profit businesses, and does not have an endowment exceeding \$50 million. Please provide documentation that will verify that the entity meets the definition provided above.

Peoria Dist 150 Responses 09/14/05: See the table below for NIF's and Entity Numbers:

Non- Instructional Facilities for Peoria School District 150		
	BEN 136178	
Entity's Legal Name	Street Address / Mailing Address (same)	Entity Number
Maintenance Dept.	436 W. Nebraska Ave.	16033223
PSD150 Stadium	315 E. War Memorial Dr	16033224
Transportation Center	1525 W. Northmoor	16033226
Administrative Center	3202 N Wisconsin Ave	16033227
Ricketts Center	520 E Lake St	16033228

If this entity is a non-instructional facility, which can be eligible for services under certain circumstances, please provide a written response to the following question: For FRN(s) 1287940, 1287942, 1287949, 1287955,

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Does either of these two descriptions accurately and completely describe your school, school district or library's situation? **If so, which one or both?** BOTH

Deleted: _____

a) The non-instructional facility is owned by the school, school district or library and is used solely for school, school district or library business.

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b) Only school, school district or library employees use the non-instructional facility.

If the FRN is a request for Priority 2 services, please also respond to the following question:

Are the Internal Connections and/or Basic Maintenance in the non-instructional facility essential for the effective transport of data and information to an instructional building of a school or to a non-administrative building of a library? N/A

Please provide a valid entity number for the above non-instructional facility. See List Above

Deleted: _____

For further information about funding requests to non-instructional facilities, consult the "Educational Purposes" document at www.sl.universalservice.org/reference/educational_purposes.asp

You may refer to the document "Entity Numbers for Non-Instructional facilities" posted in the Reference Area of the SLD web site www.sl.universalservice.org for further information.

3. APP 455386 - 470/471 Service Type Mismatch

On your original Form 471 you indicated that Form 470 # 534820000513009 is the establishing Form 470 for the service requested all FRNs. These FRNs are for Telecom Services, but the referenced Form 470 did not post for this service category, which is a violation of the competitive bidding requirements of this support mechanism.

Please verify if the referenced Form 470 is the establishing Form 470 for this service. If the referenced Form 470 is NOT the establishing Form 470 please provide the 15-digit Form 470 Number that did establish the bidding for this service. The establishing Form 470 is the specific Form 470, which was posted for that particular service for 28 days, and pursuant to which a contract was signed or an agreement was entered into. For a request in the Basic Maintenance service category, it is possible that the establishing 470 was filed under an Internal Connections service category. The establishing Form 470 could have been posted by the State, if the requested services are being purchased off of a State Master Contract.

Peoria Dist 150 Responses 09/14/05: A data entry error was made on the 471 entry for both of these FRN's. Both were tariffed services at the start of the 2004 Funding year, and both have been converted to contracted services for 2005. For both FRNs listed please make the following changes:

12. Ref 470# 946240000477363

15a. Non-Contracted tariffed/...NO
15b. Contract Number: McLeod-PSD150
15c. State Master Contract: NO
15d. FRN from Previous Year: N/A
17. Allowable Contract Date: 01/02/2004
18. Contract Award Date: 03/25/2004

All other entries are correct as stated.

4. APP 455386 – Local Centrex

The documentation provided in the Item 21 Attachments is not sufficient to determine the eligibility of your request. The documentation indicates that you have Centrex Service. Please provide more detailed documentation, such as the portion of the bill that identifies the actual products and services relating to the charges identified above; do not include detailed call pages. If the bill you receive does not identify the specific products and services being delivered, you will need to contact your vendor and request such documentation. The vendor should be able to provide you with a detailed bill identifying the specific products and services being provided, which is sometimes called a C.R.I.S. Report or S01 Report.

Any documentation provided should clearly identify any ineligible charges that were cost allocated out of your request. If you are unable to justify the charges requested on your Form 471, the request may be reduced or denied.

Peoria Dist 150 Responses 09/14/05: Copies of cover pages from bill have been requested from vendor and will be faxed under separate cover.

5. APP 455386 – Long Distance

Your item 21 documentation stated 320 telephones. Please give the number of lines for this service (it could be less than 320). _____

Peoria Dist 150 Responses 09/14/05: The Item 21 doc should have said 'lines'. There are over 40 schools in the district. 320 is the correct number of telephone lines.

Please fax or e-mail the requested information to my attention. If you have any questions please feel free to contact me.

It is important that we receive all of the information requested so PIA can complete its review. **If you are unable to provide the requested information because your school has closed or will shortly close for summer break, please let me know when you will be available to respond to these questions. Failure to do so may result in a reduction or denial of funding.**

If we do not receive the information within seven calendar days (Sept 8, 2005), your application will be reviewed using the information currently on file. If you need additional time to prepare your response, please let me know as soon as possible.

FCC APPEAL of USAC DENIAL - PEORIA SCHOOL DISTRICT 150

Should you wish to cancel this application, or any of your individual funding requests, please clearly indicate in your response that it is your intention to cancel an application or funding request(s); along with the application number and/or funding request number(s), and the complete name, title and signature of the authorized individual.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,
Marilyn Brown
Schools and Libraries Division
Program Integrity Assurance
Phone: 973-884-8503
FAX: 973-599-6521
mbrown@sl.universalservice.org